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February 14, 2020

VIA ECF

Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Lanham v. Lumenis, Inc. et al*
Case No.: 19-CV-00024-AKH

So ordered.


2-18-2020

Dear Judge Hellerstein:

This office represents the Plaintiff in the above-referenced matter. Jointly with counsel for Lumenis, we respectfully submit this letter to request a modification of the deposition schedule set by the Court in its February 11, 2020 Order (the "Order"). ECF No. 84. Upon meeting and conferring, the undersigned have agreed to the following schedule with regards to the depositions set by the Court in the Order:

1. Gerhart – February 28, 2020 at 12:00pm EST;
2. Rosa – date and time TBD but no later than March 13, 2020;
3. Mack – March 10, 2020 at 10:00am EST;
4. Cavanaugh – March 10, 2020 at 2:00pm EST; and
5. Sanicki – March 13, 2020 at 10:00am EST.

The deposition of Sanicki will be held at this office, with the remainder being conducted by remote means as the other individuals are out-of-state.

We respectfully request that the Court permit the depositions to be conducted in accordance with the above schedule. The Parties thank the Court for its time and attention to this matter.

Respectfully submitted,
Law Offices of Yale Pollack, P.C.

/s/ Yale Pollack
Yale Pollack, Esq.

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Carothers, DiSante & Freudenberger, LLP

/s/ Todd R. Wulffson

Todd R. Wulffson, Esq.

cc: All Counsel (via ECF)